

96-128

**Total Call International, Inc.**

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RECEIVEDFederal Communications Commission
Washington, DC 205444

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Federal Communications Commission
Office of the Secretary**MOTION FOR EXEMPTION/EXTENSION OF SYSTEMS AUDIT**

Total Call International, Inc. ("Total Call"), pursuant to Section 1.46 of the Commission's Rules, 47 C.F.R. 1.46 hereby requests an extension of time or exemption to file a Systems Audit Report as required by section 64.1320(b) of the Commission's rules and the Report and Order released in The Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996. FCC 03-235, CC Docket No. 96-128(rel. October 3, 2003). Specifically, Total Call seeks An exemption or 90-day extension, until October 1, 2004 of the July 1, 2004 reporting deadline.

Total Call is a small business with less than 80 employees, therefore the systems audit will have a significant economic impact on our company. Total Call is in the process of implementing changes to its system, pursuant to the Commission's rules (sec 47 C.F.R. 64.1300) to track completed payphone calls and pay compensation to payphone service providers. Total Call requests an exemption or 90-day extension to ensure that the completed audit report is based on sufficient data.

To the extent necessary, Total Call requests a waiver of the late filing penalty set out in the October order. Total Call will have the necessary call tracking system implemented by July 1, 2004 and will make the necessary calculations and payments to ensure that payphone service providers are properly compensated. Thus, the Commission should waive any penalty.

Total Call has attempted in good faith to meet the July 1, 2004 deadline; however Total Call requires additional time. Accordingly, Total Call respectfully requests an exemption or a 90-day extension of the reporting deadline, until October, 1, 2004 to submit the Systems Audit Report to the Commission, to each payphone service provider for which it completes calls, and to each facilities-based long distance carrier from which it receives payphone calls.

Sincerely,

Daniel Hamm
Controller
Total Call International